

Exhibit 2 -
January 15, 2021 Email from Larry Laurenzi

Mathew Jehl

From: Larry Laurenzi
Sent: Friday, January 15, 2021 1:13 PM
To: Cotten, Chris (USATNW)
Cc: Mathew Jehl; Nathan Bicks
Subject: RE: Discovery Request

Chris – I do think it would be beneficial for us to meet to discuss this case. I propose our finding sometime next week. We can meet at your office or we can use a conference room over here. We do have a conference room with plexiglass dividers that can accommodate several people. I will call you on Monday and see if we can agree on a time and place. We are flexible.

On our request for material from the accountant, I understand your position but our deadline is quickly approaching. We can discuss this also at our meeting..

I will call you on Monday.

Larry

From: Cotten, Chris (USATNW) <Chris.Cotten@usdoj.gov>
Sent: Thursday, January 14, 2021 12:34 PM
To: Larry Laurenzi <l Laurenzi@BPJLAW.COM>
Cc: Mathew Jehl <mjehl@BPJLAW.COM>
Subject: RE: Discovery Request

Larry,

None of the documents provided in discovery are currently Bates stamped. Since the advent of quick electronic Bates stamping, I typically hold off on doing it until closer to trial when I have a better idea of which documents I'm actually going to use. When Bates stamping does occur, I will provide you with copies of those versions.

With regard to the accountant, we have not made a final decision as to whether to use her as a witness at trial, and if so, whether to notice her as an expert witness. If she is to be an expert witness, the government is aware of its responsibilities under Rule 16(a)(1)(G) and will timely provide the required information. With that said, I remain open to the idea which you broached previously of meeting on a more informal basis to discuss the proof with an eye toward possibly reaching a resolution. Either way, I don't believe that this is an issue that will need to be resolved in a motion.

Feel free to give me a call if you would like to discuss further.

Chris

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